

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

Plaintiff,

v.

**Baker & Taylor, LLC and Bridgeall
Libraries, Ltd.,**

Defendants.

Case No. 2:25-cv-00309

Judge Edmund Sargus, Jr.

**Magistrate Judge Elizabeth Preston
Deavers**

**JOINT MOTION TO MODIFY THE APRIL 28, 2025 SCHEDULING
ORDER**

OCLC, Inc., and Baker & Taylor, LLC and Bridgeall Libraries, Ltd. (collectively, the “Parties”) jointly move the Court to modify the April 28, 2025 scheduling order, ECF No. 27. The Parties have been diligently engaging in expedited discovery, but good faith disagreements about discovery requests have delayed the Parties’ exchange of written discovery and production of documents. As a result, the Parties need additional time to exchange written discovery responses and produce documents and, by extension, will need additional time to conduct depositions and submit briefing. The Parties offer the following proposed schedule, which will give the Parties enough time to meet the deadlines and still complete briefing nearly one month before the scheduled October 6, 2025 hearing on the motion for a preliminary injunction:

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| Parties exchange written discovery responses | June 13, 2025 |
| Plaintiff files opposition to Defendants’ Fed. R. Civ. P. 12(b)(6) motions to dismiss | June 17, 2025 |
| Defendants file replies in support of Fed. R. Civ. P. 12(b)(6) motions to dismiss | July 1, 2025 |

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| Document production substantially completed | July 25, 2025 |
| Depositions completed | August 15, 2025 |
| Defendants file opposition to P.I. Motion | August 25, 2025 |
| Plaintiff files opposition to Bridgeall Libraries, Ltd.'s Fed. R. Civ. P. 12(b)(2) motion to dismiss | August 25, 2025 |
| Plaintiff files reply in support of P.I. Motion | September 8, 2025 |
| Bridgeall Libraries, Ltd. files reply in support of Fed. R. Civ. P. 12(b)(2) motion to dismiss | September 8, 2025 |
| Preliminary Injunction Hearing | October 6, 2025 |

A proposed order granting this motion is attached.

Respectfully submitted,

/s/ Jeffrey M. Walker

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*Attorneys for Defendants Baker & Taylor, LLC
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CERTIFICATE OF SERVICE

On June 10, 2025, this document was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties.

/s/ Jeffrey M. Walker

Jeffrey M. Walker, Trial Attorney